

## **REMARKS**

Claims 1-21 are now pending in the application. Claims 1, 6, and 11 are amended. Claim 21 is added. Support for the amendments and additions can be found in the originally filed specification at paragraph [0013] and [0020]. The Examiner is respectfully requested to reconsider and withdraw the rejections in view of the amendments and remarks contained herein.

### **REJECTION UNDER 35 U.S.C. § 102**

Claims 6-10 stand rejected under 35 U.S.C. § 102(b) as being anticipated by Coburn et al. (U.S. Pat. No. 6,892,216). This rejection is respectfully traversed.

The Examiner relies on Coburn et al. to teach a diagnostic station connected directly with vehicle processors by a USB port. However, Coburn et al. do not teach a vehicle having an interface processor in communication with an open architecture communications port and connected to a system bus, wherein the interface processor is adapted to identify, for each of multiple processors, appropriate files stored on a portable memory device connected to the open architecture communications port.

In particular, Applicant's claimed invention is directed toward a vehicle having an interface processor in communication with an open architecture communications port and connected to a system bus, in which the interface processor is adapted to identify, for each of multiple processors, files stored on a portable memory device connected to the open architecture communications port. For example, independent claim 6, as amended, recites, "an interface processor in communication with the open architecture communications port and connected to the system bus, wherein said interface

processor is adapted to identify, for each of said multiple processors, files stored on a portable memory device connected to said open architecture communications port.” Therefore, Coburn et al. do not teach all of the limitations of the independent claim.

Accordingly, Applicants respectfully request the Examiner reconsider and withdraw the rejection of claim 6 under 35 U.S.C. § 102(b), along with rejection on these grounds of all claims dependent therefrom. Claim 21 depends from claim 6 and should be allowed for the same reasons.

#### **REJECTION UNDER 35 U.S.C. § 103**

Claims 1-5 and 11-20 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Coburn et al. (U.S. Pat. No. 6,892,216) in view of Kim et al. (U.S. Pat. App. Pub. No. 2004/0019736). This rejection is respectfully traversed.

The Examiner relies on Coburn et al. to teach a diagnostic station connected directly with vehicle processors by a USB port. However, Coburn et al. do not teach, suggest, or motivate a vehicle having an interface processor in communication with an open architecture communications port and connected to a system bus, wherein the interface processor is adapted to identify, for each of multiple processors, files stored on a portable memory device connected to the open architecture communications port.

The Examiner relies on Kim et al. to teach a portable USB memory device. However, Coburn et al. and Kim et al. do not teach, or suggest a vehicle having an interface processor in communication with an open architecture communications port and connected to a system bus, wherein the interface processor is adapted to identify,

for each of multiple processors, files stored on a portable memory device connected to the open architecture communications port.

Applicant's claimed invention is directed toward a vehicle software installation, upgrade, and diagnostic system and method. In particular, Applicant's claimed invention is directed toward a system and method including a vehicle having an interface processor in communication with an open architecture communications port and connected to a system bus, in which the interface processor is adapted to identify, for each of multiple processors, files stored on a portable memory device connected to the open architecture communications port. For example, independent claim 11, especially as amended, recites, "employing the interface processor to identify, for each of said multiple processors, files stored on the portable memory device, and to load software received over the open architecture communications port onto the multiple processors." Claim 1, especially as amended, recites similar subject matter. Therefore, Coburn et al. and Kim et al. do not teach, suggest, or motivate all of the limitations of the independent claims. These differences are significant.

Accordingly, Applicants respectfully request the Examiner reconsider and withdraw the rejection of claims 1 and 11 under 35 U.S.C. § 103(a), along with rejection on these grounds of all claims dependent therefrom.

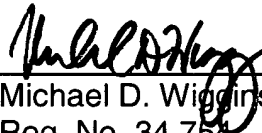
## CONCLUSION

It is believed that all of the stated grounds of rejection have been properly traversed, accommodated, or rendered moot. Applicant therefore respectfully requests that the Examiner reconsider and withdraw all presently outstanding rejections. It is believed that a full and complete response has been made to the outstanding Office Action and the present application is in condition for allowance. Thus, prompt and favorable consideration of this amendment is respectfully requested. If the Examiner believes that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at (248) 641-1600.

Respectfully submitted,

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By: \_\_\_\_\_

  
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